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January 28, 2009

EPA Region 5 Records Ctr.



361391

Ms. Christine Roque
Illinois Environmental Protection Agency
Bureau of Land
1021 N. Grand Avenue East
Springfield, IL 62702

RE: ML-6 Investigation Area Gas Probe Exceedances
Mallard Lake Landfill, Hanover Park, Illinois - AECOM Project No. 13069002

Dear Ms. Roque:

AECOM, Inc. (AECOM) on behalf of BFI Waste Systems of North America, LLC (BFI), has been investigating the elevated methane concentrations in the vicinity of gas monitoring probe ML-6. This work was conducted pursuant to the December 6, 2007 work plan which was submitted to USEPA and the IEPA to address the requirements of the Administrative Order on Consent (AOC) for RCRA Docket No. 7003-5-08-001. Following the June 27, 2008 detection of methane gas above the lower explosive limit (LEL) for methane at probe ML-6 (located northeast of Mallard Lake Landfill), a supplemental investigation was initiated. Further investigation into the ML-6 gas probe exceedance identified additional exceedances at newly installed gas probes ML-6i on September 5, 2008 and GPT-8 on September 12, 2008. As a result of these detections, a supplemental work plan to investigate the presence of methane gas in the vicinity of probe ML-6 was submitted to USEPA and IEPA on September 24, 2008.


As discussed in the September 24, 2008 work plan, BFI, in conjunction with the Forest Preserve District of DuPage County, has continued to investigate the source of the exceedances in the vicinity of probe ML-6. Pursuant to the September 24, 2008 supplemental work plan, AECOM has installed 32 additional gas monitoring probes in the vicinity of gas probe ML-6. Notifications of methane concentrations greater than 50% of the LEL have been reported to USEPA and IEPA pursuant to requirements of permit condition VIII.7 and Title 35 of the Illinois Administrative Code Section § 811.311(a)(1) and (b)(1).

As indicated by the previously submitted notification letters, Mallard Lake Landfill permit condition VIII.7 requires the applicant to submit either a permit application detailing the mitigation steps to address the exceedance of methane concentrations in the vicinity of probe ML-6, or provide a demonstration showing that the gas is attributed to a source other than the Mallard Lake Landfill. Because the investigations spanned a period of a couple of months and future investigation will require authorization from the Keeneyville School District to complete the investigation at the Greenbrook School, AECOM requests that the 90 day permit application submission requirement begin subsequent to the most recent exceedance notification for gas probe ML-13S. The notification of this probe exceedance was provided on December 12, 2008. Consequently, AECOM proposes to submit an application for significant modification to address all of the observed gas probe methane exceedances by March 12, 2009. Concurrently, BFI and the Forest Preserve District will also seek to resolve this exceedance with USEPA pursuant to the requirements of the Administrative Order Docket No. RCRA 7003-5-08-001.

Please do not hesitate to contact Craig Rawlinson at (847) 279-2449 if you have any questions or comments on this notification.

Sincerely,


Matthew D. Weiss
Assistant Project Hydrogeologist


Craig S. Rawlinson, P.G.
Associate Hydrogeologist

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cc: Mr. Steven Faryan, USEPA
Mr. John Richardson, IEPA Bureau of Land
Mr. Joseph Benedict, Forest Preserve District of DuPage County
Mr. Jim Hitzeroth, BFI Waste Systems, LLC